



[REDACTED]

defendants, did knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to manufacture and distribute a mixture or substance containing a detectable amount of Gamma Hydroxybutrate (“GHB”), a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

**Count Two**

Violation: 21 U.S.C. § 846 (Conspiracy to Possess with the Intent to Manufacture and Distribute Methamphetamine)

That from sometime in or about January 2018, and continuously thereafter up to and including July 9, 2019, in the Eastern District of Texas and elsewhere,

[REDACTED]

**Rafael Ramirez**

[REDACTED]

defendants, did knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to manufacture and distribute 500 grams or more

of a mixture or substance containing a detectable amount of methamphetamine and 50 grams or more of methamphetamine (actual), a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

**Count Three**

Violation: Title 21 U.S.C. § 848(a)  
(Continuing Criminal Enterprise)

That from sometime in or about January 2015, and continuously thereafter up to and including October 10, 2018, in the Eastern District of Texas and elsewhere, [REDACTED] [REDACTED] and **Rafael Ramirez**, defendants herein, did unlawfully, knowingly and intentionally engage in a continuing criminal enterprise in that they unlawfully, knowingly and intentionally violated 21 U.S.C. § 846 which violation includes, but is not limited to, the substantive violations alleged in Counts One and Two of this Indictment, to wit: Conspiracy to Possess with the Intent to Manufacture and Distribute Gamma Hydroxybutrate (“GHB”) or Methamphetamine, and which violations were part of a continuing series of violations of the Controlled Substances Act, Title 21, United States Code, Section 801, et seq., undertaken by defendants [REDACTED] [REDACTED] and **Rafael Ramirez**, in concert with at least five other persons with respect to whom [REDACTED] and **Rafael Ramirez**, occupied positions of organizer, supervisor, and any position of management, and from which such continuing series of violations the defendants obtained substantial income and resources.

All in violation of 21 U.S.C. § 848(a).

**NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE**

As a result of committing the offenses charged in this Indictment, the defendants shall forfeit to the United States, pursuant to 21 U.S.C. § 846, all property used to commit or facilitate the offenses, proceeds from the offenses, and property derived from proceeds obtained directly or indirectly from the offenses, including but not limited to:

All such proceeds and/or instrumentalities are subject to forfeiture by the government.

A TRUE BILL

\_\_\_\_\_  
GRAND JURY FOREPERSON

JOSEPH D. BROWN  
UNITED STATES ATTORNEY

\_\_\_\_\_  
ERNEST GONZALEZ  
Assistant United States Attorney

\_\_\_\_\_  
Date



**Count Three**

Violation: 21 U.S.C. § 848(a)

Penalty: Any person who engages in a continuing criminal enterprise shall be sentenced to a term of imprisonment which may not be less than 20 years and which may be up to life imprisonment, a fine not to exceed \$2 million, or both; supervised release of at least eight years;

If any person engages in such activity after one or more prior convictions under this section have become final, he or she shall be sentenced to a term of imprisonment which may not be less than 30 years and which may be up to life imprisonment, a fine not to exceed \$4 million, or both; supervised release of at least ten years.

Special Assessment: \$100.00